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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 DARLINE LINDA STINGLEY,)
12 Plaintiff,) Case No. 2:22-cv-01761-NJK
13 v.) **STIPULATION TO VOLUNTARY**
14 KILOLO KIJAKAZI,) **REMAND PURSUANT TO SENTENCE**
15 Acting Commissioner of Social Security,) **FOUR OF 42 U.S.C. § 405(g) AND TO**
16 Defendant.) **ENTRY OF JUDGMENT FOR**
17) **PLAINTIFF**

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19 IT IS HEREBY STIPULATED by and between the parties, through their undersigned
20 attorneys, and with the approval of the Court, that this action be remanded for further administrative
21 action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.
22 On remand, the Commissioner will offer Plaintiff the opportunity for a hearing; take any further action
23 needed to complete the administrative record; and issue a new decision.
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1 The parties further request that the Clerk of the Court be directed to enter a final judgment in
2 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

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4 Dated: April 10, 2023

Respectfully submitted,

5 /s/ Marc V. Kalagian
6 MARC V. KALAGIAN
7 (*as authorized via email on April 4, 2023)
8 Attorney for Plaintiff

9 Dated: April 10, 2023

Respectfully submitted,

10 JASON M. FRIERSON
11 United States Attorney

12 /s/ Zachary Berkoff-Cane
13 ZACHARY BERKOFF-CANE
14 Special Assistant United States Attorney
15 Attorneys for Defendant

16 Plaintiff's motion for remand, Docket No. 20, is **DENIED** as moot.

17 IT IS SO ORDERED:

18 
19 HON. NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE

20 DATED: April 11, 2023
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